



U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

D. W.

APPELLANT

CASE NO.

1:22-CV-01121

v.

BOY SCOUTS OF AMERICA  
AND DELAWARE BSA, LLC  
APPELLEE

APPLICATION FOR CERTIFICATION  
OF CLASSES CLASS ACTION

I. INTRODUCTION:

NOW COMES APPELLANT D. W.  
WHO RESPECTFULLY APPLYING TO THIS  
FEDERAL DISTRICT COURT TO GRANT  
APPELLANT D. W. WHO IS CLAIMANT #  
# 114457 IN CASE NO. 20-10343  
IN U.S. BANKRUPTCY COURT, DELAWARE  
A CERTIFICATION OF CLASSES CLASS  
ACTION

①

THE CLAIMANT #114457 IS  
A CLASS MEMBER, A TYPICAL CLASS  
REPRESENTATIVE THAT IS ADVANCE

THE INTEREST OF THE ENTIRE  
CLASS IN PURSUING HIS CLAIMANT  
# 114457 OWN CLAIMS

CITING SPRAGUE, 133 F.3d AT 399

THERE ARE COMMONALITY OF TARGETED  
CLAIMS, RED FLAG CLAIMS AND  
UNREPRESENTED CLAIMS AND PRISONER  
CLAIMS THAT INTEREST WAS NOT  
PROTECTED WITHIN THE CONFIRMATION  
PLAN OR AMENDMENTS, OR SUPPLEMENTS  
OR CONSENTS THAT WARRANTS A  
CERTIFICATION OF CLASSES CLASS ACTION  
FED. CIVIL RULE 23A

PRIOR TO AFFIRMATION  
OF THE CONFIRMATION PLAN TO  
PROTECT THE UNREPRESENTED, TARGETED,  
RED FLAG CLAIMS

② THAT VIOLATES PRIMA FACIE  
INFORMATION STATEMENTS THAT  
FAILED TO INFORM CLASS MEMBERS  
OF A DISCRIMINATORY ABUSE OF PROCESS  
OF RED FLAGGING AND TARGETING IN  
EXHIBIT A PROOF OF CLAIM  
FILED IN APPENDANT BRIEF

THIS WARRANTS A CERTIFICATION  
PURSUANT TO FED. CIVIL, 23A

## STATEMENT OF FACTS

1. THE DEFENDANTS VIOLATED GOOD FAITH IN TRUTH FEDERAL COMMON LAW
2. THAT DEFENDANTS APPELLEE OWED A LEGAL DUTY TO THE CLASS PURSUANT TO FAIR AND EQUITY BANKRUPTCY CODES AND CONSTITUTIONAL EQUAL PROTECTION LAWS, DUE PROCESS
3. THAT APPELLEE DEFENDANTS HEREBY BREACHED EACH OF THE ABOVE DUTIES AND VIOLATED THE CONSTITUTION AND BANKRUPTCY CODES
4. THAT THE DEFENDANT APPELLEE WAS GUILTY OF FEDERAL RICO ACT LAW VIOLATIONS, FRAUD CONCEALMENT DOCTRINE VIOLATION AND LAW, ENTRAPMENT FED. LAW VIOLATION AND VIOLATION OF TORTURE VICTIM PROTECTION ACT (1) SUBJECTING AN INDIVIDUAL TO TORTURE IN A CIVIL ACTION WITHIN CONFIRMATION PLAN AMENDMENTS, CONSENTS AND CONTRACTS OR AGREEMENTS,
5. THAT APPELLEE WAS CARELESS AND NEGLIGENT IN THE DESIGN, NEGOTIATIONS, AND CONSTRUCTION OF CONFIRMATION PLAN REORGANIZATION AND CONTRACTS OR AGREEMENTS

THAT WAS INFLICTED UPON THE  
TARGETED, REDFLAG, PRISONERS, AND  
UNREPRESENTED AND DISCRIMINATED

6. THAT AS A RESULT VIABLE PROOF OF  
CLAIMS, WAS REDUCED IN VALUE,  
PROHIBITED, OR DENIED UNJUSTLY AND  
WITHOUT VIABLE REPRESENTATION THAT  
ADEQUATELY PROTECT THE INTEREST  
OF CLASS MEMBERS WITHIN THE CLASS

7. WHEREFORE THE APPELLANT D.W. #114457  
CLAIMANT PRAY'S FOR RELIEF

A) GRANT A CLASSES CLASS ACTION  
TO PROTECT INTEREST OF REDFLAG CLAIMS,  
PRISONER CLAIMS, TARGETED CLAIMS, AND  
UNREPRESENTED CLAIMS PURSUANT TO FED R  
CIVIL 23A

④ B) GRANT A JURY TRIAL FOR  
CLASSES CLASS ACTION

C) REVOKE CONFIRMATION ORDER  
UNTIL INTEREST ARE PROTECTED  
WITHIN CONFIRMATION PLAN



DATE 9-14-22

[REDACTED]  
D. [REDACTED] # [REDACTED]  
P.O. BOX 8107  
MANFIELD, OHIO 44901

D. [REDACTED] DULY SWORN STATES HE HAS READ  
THE FOREGOING INSTRUMENT AND ITS TRUE UPON  
INFORMATION AND BELIEF TO THESE MATTERS  
HEREIN THEREOF MATTERS HE BELIEVES TO BE TRUE

[REDACTED]  
PLAINTIFF

SWORN TO AND SUBSCRIBED TO ME IN MY  
PRESENCE THIS 14 DAY OF September 22

MY COMMISSION EXPIRES:  
May 17, 2025



KELLY ROSE  
Notary Public  
State of Ohio  
My Comm. Expires  
May 17, 2025

[Signature]  
NOTARY PUBLIC, RICHLAND  
COUNTY, STATE OF OHIO

⑤

DEMAND FOR JURY TRIAL  
PLAINTIFF DEMAND A JURY TRIAL

DATE 9-14-22

[REDACTED]  
D. [REDACTED] # [REDACTED]  
P.O. BOX 8107  
MANFIELD, OHIO 44901

## CONCLUSION

WHEREFORE FOR REASON'S HONOR  
APPELLANT D.W. IS REQUESTING THIS  
HONORABLE COURT TO GRANT CERTIFICATION  
OF CLASSES CLASS ACTION AND DENY  
OR REVOKE CONFIRMATION ORDER

RESPECTFULLY SUBMITTED

D. [REDACTED] W. [REDACTED] [REDACTED]

P.O. BOX 8107

MANFRED, OHIO 44901

## CERTIFICATE OF SERVICE

I THE UNDERSIGNED CERTIFY THAT A COPY OF THE  
FOREGOING INSTRUMENT WAS MAILED 9-14-22  
UPON DEREK C. ABBOTT AT 1201 NORTH  
MARKET STREET, WILMINGTON, DE 19899

D. [REDACTED] W. [REDACTED]  
PROSE

(6)

Inmate  
Correspond  
RICI



US POSTAGE PAID PITNEY BOWES



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allow



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U.S. DISTRICT COURT  
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT

844 N. KING STREET, UNIT 18

WILMINGTON, DELAWARE 19801-3570

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